

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

IN RE	*	CASE NO. 21-01666 MCF
	*	
SHARON ORTIZ ALAMO	*	
	*	
<u>DEBTOR</u>	*	CHAPTER 13

**DEBTOR'S REPLY TO *TRUSTEE'S MOTION TO DISMISS* DOCKET NO. 41  
AND IN COMPLIANCE WITH *ORDER* DOCKET NO 43**

TO THE HONORABLE COURT:

**NOW COMES, SHARON ORTIZ ALAMO**, the Debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. On January 21, 2022, this Honorable Court issued the following *ORDER*:

***ORDER***

“The motion filed by debtor requesting extension of time to reply to Trustee’s motion to dismiss (docket #42) is hereby granted”. *ORDER* dated January 21, 2022, Docket No 43.

2. The Debtor hereby respectfully states that she [the Debtor] has cured the arrears in her confirmed Plan payments to the Trustee. On February 18, 2022, she made one (1) payment in the sum of \$1,434.00 through check number 20063111, to cure the arrears in the Debtor’s confirmed Chapter 13 Plan. Attached is copy of the aforementioned check made to the Trustee, as evidence of having cured the arrears.

3. The Debtor respectfully submits that the Plan arrears in the confirmed Plan payments have been cured, thus, the Debtor respectfully requests the Court grant the present reply to the *Trustee's Motion to Dismiss*, Docket No. 41, in compliance with this Court’s *ORDER*, Docket No. 43, in the above captioned case.

**WHEREFORE**, the Debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing reply to the Trustee’s motion requesting

dismissal Docket No. 41 and in compliance with *ORDER* dated January 21, 2022, Docket No. 43, in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send sent notice of same to the following: the Chapter 13 Trustee and to all CM/ECF participants; I also certify that a copy of this motion was sent via US Mail to the Debtor Sharon Ortiz Alamo, HCo1 Box 12025, Carolina PR 00987.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 18<sup>th</sup> day of February, 2022.

**/s/ Roberto Figueroa Carrasquillo**  
RFIGUEROA CARRASQUILLO LAW OFFICE PSC  
USDC #203614  
ATTORNEY FOR the DEBTOR  
PO BOX 186 CAGUAS PR 00726  
TEL NO 787-744-7699/787-963-7699  
Email: [rfc@rfigueroalaw.com](mailto:rfc@rfigueroalaw.com)

Purchaser: SHARON ORTIZ-ALAMO

Payee: JOSE R CARRION  
CASO 21-01666/MCF13

Branch: 0042  
Teller: 23435p

Amount: \$1,434.00  
Fee: \$10.00  
Total: \$1,444.00

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**1 First Bank**

### Manager's Check

Check No. 20063111

101-71472215

Date: 02/18/2022

Purchaser: SHARON ORTIZ-ALAMO

Pay One Thousand Four Hundred Thirty-Four and 00/100ths Dollars

**\$1,434.00**  
DOLLAR ONE THOUSAND FOUR HUNDRED THIRTY-FOUR AND 00/100

To The Order of: JOSE R CARRION  
CASO 21-01666/MCF13

Valid for Six Months After Issue Date  
Branch 0042 Teller No. 23435p

*Sharon Ortiz Alamo*

**FDIC** DRAWN ON FIRSTBANK  
SAN JUAN, PUERTO RICO

YYNS-5001-0911R

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